

**Edinburgh Local Development Plan (LDP)**  
**Response to Main Issues Report (MIR) Consultation**  
**on behalf of CTC Lothians**

We shall attempt, in responding, to follow the framework of the 20 Questions posed in the Report. Some of the issues, however, require longer discussion than a simple choice of option; and in some cases the same issues range over a number of questions.

(Note: the document gives rather specialised meanings to the terms 'town centre' (of which Edinburgh has 9) and 'local centre' (of which there are 61 within the city)).

Q1 AIMS ('do you agree with these aims?')

AIM 3 'Sustainable transport and access to jobs and services'

We agree with most of this, especially the first 2 sentences, but there needs to be more emphasis, here and throughout the document, on the importance of reducing the need to travel, which is given top priority in national policy (SPP), and of the role of active travel (cycling and walking), which is accorded second priority. Travel issues lie at the very heart of land use, and it is important to get it right.

Edinburgh is already a compact city, as MIR notes (2.4). But MIR fails to give sufficient emphasis to the fact that, to reduce the need to travel, new housing developments should be sited close to existing communities, ie within walking and cycling distance, and not cut off from them by barriers such as major roads or railways. In consequence, proposed sites should be assessed with this as the number 1 criterion, *followed by* access to public transport etc. MIR gives the impression that availability of good public transport is sufficient to justify a development (eg those in W Edinburgh north of Maybury). This is not the case.

Hence, we suggest re-wording the final sentence of (3) as follows: "... ensure new development is directed primarily to locations which reduce the need to travel, then to locations which favour active travel, and only then to locations which can be accessed ...."

AIM 4 ('improve our environment')

There is an unfortunate overlap of Aims 4 and 5 ('create sustainable communities'), which should perhaps be merged into one Aim.

Emissions from transport are high (about 25% of the total) and – even worse – they are rising, when other sources are falling. Hence the significance of careful planning to reduce the need to travel.

The third sentence of AIM 4 should include a reference to 'minimising the need to travel', and 'encouraging active travel', eg "Reducing greenhouse gas emissions *from minimising the need to travel*, from new buildings,..."

AIM 5 ('create sustainable communities')

The accepted meaning of 'sustainable' is: 'meeting current needs, without compromising those of future generations'. But this AIM seems to be more about *quality* of life in current communities – which is high, but definitely not sustainable at present – our consumption of resources is estimated at about three times what would be sustainable. AIM 5 as presently worded is too complacent, and should focus on what needs to be done to BECOME sustainable. Alternatively, the aim's title should be changed.

Q2 Housing, West Edinburgh.

We do not support the preferred option, nor any of the alternatives given.

Reasons:

The reasoning in the 'housing' chapter is muddled, probably because the normal growth model has been thrown out of kilter by recent (last 3 years) economic factors.

The basic principles should, in our view, be:

- 1 only use greenfield land if no more brownfield land is available;
- 2 preserve the Green Belt;
- 3 locate housing within or adjacent to existing communities, so that basic amenities (schools, shops etc) are within walking distance;
- 4 locate housing close to public transport.

These principles are outlined in the national SPP, and the LDP should include them, and state its support for them. Taking the longer-term view, if greenfield and GB land is nibbled away, however gradually, we eventually urbanise all the land. Quite significant parts of the GB have already been sacrificed in recent years.

We appreciate that the problem with brownfield is that its availability can be unpredictable. However, in recent times the supply of brownfield has been more than sufficient, as witnessed by sites given planning permission and not subsequently taken up. If developers are offered greenfield, they will go for that first, because it's cheaper and easier to build on.

The policy therefore should be to offer no more greenfield, so long as brownfield is available (ie for the foreseeable future).

The West Edinburgh sites listed also fail the criteria of sustainability:

*Maybury 1 and 2* are separated from their local communities by the barriers of Maybury Road to the east, the Glasgow Rd to the south, and the main railway. The Gyle Centre could be their main centre for shopping, but there is no crossing of the Glasgow Rd for pedestrians/cyclists; the proposed Interchange underpass will only be for users of the station, not for the general public.

*Cammo*, west of Maybury Rd, has the barrier of Maybury Rd itself, and is generally not near any amenities.

*The 'other options'* are similarly isolated, and not possible to integrate within existing communities.

As a result, all these proposals would result in car-dependent developments.

By contrast, Leith Docks, mentioned in 3.22, can supply (according to MIR) up to 18,000 residential units, and 'ticks all the boxes' for sustainability; it would be close to existing communities and their amenities; it is relatively close to the city centre (within cycling distance); and it would be well served by public transport – buses and trams. It is also, of course, brownfield.

Another brownfield site, recently developed, seems to offer excellent sustainability; I refer to Tytler Gardens, off Croft an-Rìgh, which is well integrated into the existing community, close to the city centre, has good public transport links, and is high-density but very well laid-out to give the impression of spaciousness. Surely the city needs more developments of this kind, rather than the

ones proposed in the LDP?

So, if Leith Docks and other brownfield sites are available, why should the city set aside greenfield land for housing?

Q3 Housing, South-East Edinburgh

We do not support the preferred option, nor any of the alternatives, for similar reasons as for Q2. All the sites mentioned fail the sustainability criteria. All the sites are greenfield, and in some cases GB too.

*Burdiehouse 2* is a particularly bad example. It is completely isolated from all amenities; no schools, no shops, no local community within walking distance. There is limited public transport available at the western end of the site only.

*Gilmerton 1* is similarly isolated.

*Gilmerton 2 and Drum 1 and 2* have some public transport availability but again could not be integrated within a local community, and are beyond walking distance for most amenities.

*Newcraighall 1 and 2* would depend on Newcraighall village, which has a primary school and one small shop. The nearest supermarket is not far 'as the crow flies' but in practice is miles away. Public transport goes in one direction (east-west) only, and does not serve the supermarket nor schools. Road congestion in the area is already bad.

In consequence, all these proposals would be heavily car-dependent, hence not sustainable.

Q4 Greenfield sites in other parts of the city

For reasons already given, we support the preferred option.

Q5 Housing land in the built-up areas

We support the 'reasonable alternative'. This question raises the issue of conformity to the SDP. The problem is that the SDP is by its very nature too inflexible, and cannot adapt to changing economic circumstances. There is no point in setting aside land for housing, when the options are not taken up for years because of the current recession.

MIR says, if the land is not set aside, there is the risk that it will be used for other purposes - but how likely is that risk, given that economic growth has now slowed down?

It seems to us that an adequate supply of brownfield land will continue to become available, and that turning such land into housing has many advantages, especially its location within existing communities.

We would be opposed to the Council making any concessions to developers in terms of density. We think this would set a bad precedent, which developers would be quick to take advantage of. In addition, the very quality of our city is based on high density and compactness, and we need to enhance this quality for reasons of sustainability.

Having said that, we do appreciate the demand for family homes. From what we have heard, Edinburgh is short of such accommodation, meaning that families often move to far-flung places,

and commute, often by car. To mitigate this, developments could be allowed to mix in houses or larger flats to suit families. We would welcome more discussion of these issues in the MIR (even the Monitoring Statement has little to say on the need for family housing).

#### Q6 Housing Regeneration Proposals – Leith Docks

We support the preferred option. We have already argued that Leith Docks scores well on sustainability criteria, being close to a strong existing community with many facilities, well served by public transport, within cycling distance of the city centre (shops, jobs etc), and built on brownfield land.

We are sure the national government could find an alternative site for the off-shore renewables, perhaps somewhere like Dundee, which badly needs some regeneration.

#### Q7 Housing Regeneration - other specific places

The other small sites do not score well for sustainability. They are on the edge of existing communities, hence rather remote from facilities, and liable to become car-dependent. The topography is also against them in the cases of Clovenstone Drive and Curriemuir End. We support the 'reasonable alternative'.

#### Q8 HMO's

We support the preferred option, for reasons given in the document.

#### Q9 Infrastructure Provision

We agree that “while the Council wants ... development, this should not result in an additional burden on public finances”.

We feel, however, that developer contributions could be better targeted. Most transport contributions are currently spent on infrastructure for cars, for example installing traffic lights, remodelling junctions etc. If new developments are sited on sustainable principles, the role of cycling and walking would be enhanced. Provision for these modes is much cheaper than for cars, and better value for money, quite apart from the savings from better health and a cleaner environment.

We do not support the 'reasonable alternative', or the 'other option', both of which would set a bad precedent. We support the preferred option, but with the proviso that the money could be better spent on provision for the active travel modes. In addition, if car parking requirements were eased, this could help developers by enabling more units to be built on the sites. It would be well to assume that the city's support for active travel will pay off.

#### Q10 Provision of office space

We broadly support the preferred option. We find it difficult, however, to agree with the Edinburgh Business Forum on a “shortage of new floorspace in the city centre”. There are unoccupied office blocks all over the city, including, from casual observation, the city centre, eg the St David's House block on Morrison St, and the huge former DHSS building bounded by Spittal St, Lady Lawson St and West Port.

The problem with offices is obvious – fluctuation of occupancy, depending on the economic climate. Would it not be possible to design buildings whose functions could be changed to suit the economic times? Edinburgh always seems to need more hotel rooms and more student

accommodation. Flexible buildings could become offices in good times, and hotel or student rooms when times are bad.

We also support the principle of mixing small-scale office accommodation within residential areas. This is sustainable because people can have the chance to work near where they live.

Increasingly, people will choose to use one room of their homes as an office. This is highly sustainable as it reduces the need to travel. Perhaps developers should be encouraged to provide houses/flats with an extra room, for this purpose.

New office blocks in the city centre should be refused so long as existing capacity remains unfilled – unless developers can offer flexible property as suggested above.

#### Q11 Provision for Small Businesses

We broadly support the preferred option. Mixing small businesses with residential makes sense, as it may reduce the need to travel by bringing the workplace close to home. Developers could encourage take-up, and house sales, by incentives, for example house buyers might be given the option of a small business premises within the development, at a discount.

#### Q12 New Retail Development

We support the preferred option, on the grounds that this is the most sustainable. The city centre has the advantage (from the 'eco' viewpoint) of being accessible by active travel and by public transport. Town centres can be accessed locally, and this should be encouraged. The commercial centres and out-of-town are heavily car-dependent; they can offer cheaper prices through bulk buying, but they incur heavy environmental costs (fuel, loss of land to car parks, poor air quality, poorer health from not engaging in active travel, etc). These costs are borne by the whole community, and this is not fair. We would like to see fiscal measures put in place to achieve a better balance between these and town/city centres. We are opposed to the 'other option' at the end of 6.16.

#### Q13 Alternative Uses of Shop Units in Princes St

We support the preferred option of opening up the uses of the frontages, especially in Princes St., where we hope that, once 'the dust has settled' and the street becomes a thoroughfare for pedestrians, cyclists and trams only, a 'cafe culture' will develop, which will complement the shops and enable them to 'feed' each other.

#### Q14 Alternative Uses of Shop Units in City and Town Centres

We support the preferred option, because there are too many empty units in the town centres at present, and if customers are attracted to these centres for other reasons, that will help the shops to stay viable.

#### Q15 Removing existing settlements from the Green Belt

We support the preferred option, namely to remove five large existing settlements – RBS at Gogar, Heriot-Watt, etc., with the exception of Royal Elizabeth Yard, which is remote from public transport and would be totally unsustainable if it became residential.

We strongly support the concept of the GB, and believe it is the responsibility of the Council, on behalf of all citizens, to resist developer pressure. We appreciate how strong this pressure can be. We know how developers buy up farmland close to the urban boundaries, in the hope that

eventually they will win planning permission. This is partly why we argued, earlier, against offering developers any greenfield land, so that eventually they too might 'get the message' that the public are serious in their wish to preserve greenfield land, whether in the GB or not.

The Monitoring Statement gives an indication of just how much GB land has been lost in recent years: *between 2005 and 2010, 56% of the 79 applications in the Green Belt [n = 44] were approved and 50% of the 14 applications were approved in the Countryside Area.* (the MS describes this as a “marginal success” - read this as a euphemism for 'failure').

#### Q16 Opportunities to Improve the Green Network (CSGN)

We believe the Green Network (GN) should be enhanced right across the city, and not just in the parts of W and SE Edinburgh identified for new housing. We argued earlier that there is no good reason to prefer these areas anyway, since the proposals are not sustainable either collectively or individually; and we argued that housing requirements for the foreseeable future can be met through re-use of brownfield land.

The latter can be found throughout the city, which is a very good thing for the GN, because it means that it can be enhanced anywhere and everywhere, and if this happens in areas which were formerly heavily industrialised, then so much the better. Every planning application can be scrutinised for GN opportunities, and developers will have the opportunity to contribute. This approach would also make it much easier to join the network up, to provide longer linear corridors which can be used for leisure and commuting, much as the old rail network and the canal are used today.

As an example, there is currently an application for a large residential development in W Bowling Green St, Leith. The developers are keen to provide a path beside the river, so that the Water of Leith Walkway, which currently has to leave the riverside and use side streets, will in future be able to keep to the river corridor.

We thus support a version of the preferred option, modified to include the whole city rather than just parts of W and SE Edinburgh. This modification could be achieved by simply *deleting the first clause* of the preferred option.

#### Q17 Local Centres and Facilities

We support the preferred option because it is sustainable, it makes the local centres more viable, and it might reduce the need to travel. The arguments are similar to those for Q13 and Q14 above.

#### Q18 Sustainable Building Design

This is a fairly technical question, as to whether it comes under Planning or under Building Standards. We agree with the 'reasonable alternative', as indeed you do yourselves.

There are, however, further issues which could be considered. We strongly support the more widespread application of solar thermal and solar PV, on the grounds that the power is generated exactly where it will be used; there are no transmission losses, the energy is completely from renewable resources, no huge wind turbines, no massively expensive off-shore installations, etc – a very good example of 'small is beautiful'.

However, Edinburgh has a problem because of its high number of tenements and other shared-roof buildings such as the '4-in-a-block'. At present it is virtually impossible to get the agreement of

the multiple owners for a solar system, because the power generated can only be fed to one meter.

We feel the Council should be exploring the possibility of communal meters, so that several households could benefit simultaneously. One roof could in some cases be sufficient to power a whole building, and all residents would benefit from cheap and non-carbon electricity.

We would like to see this issue discussed in the LDP, along with a proposal for further study of the possibilities.

#### Q19 Waste Management

A tricky one. Clearly there will be big changes in waste management in the fairly near future, and if the amount of waste going to landfill is much reduced, this supports an argument for the waste to be treated in small local facilities or in CHP schemes. The most sustainable is probably that the waste travels the least distances. We feel the LDP should keep the options open.

It's not clear if the Eastern Leith item refers to a proposal for a biomass plant there, or to something else. Whatever happens, it must be compatible with the mixed-use proposals for Leith Docks, including a substantial amount of residential, discussed earlier. Would residents be happy living next to a biomass plant? If it provided free heat, maybe they would! If it relied on wood imports from outside, that would make it less sustainable.

#### Q20 Other Possible Changes

1 Affordable Housing: remove requirement for this to be on-site. Sounds OK, with suitable safeguards.

2 Infrastructure: how welcome, that the proposals include no new roads, and the deletion of some earlier ones such as the Currie bypass!

We are opposed in principle to the 2<sup>nd</sup> Forth Road Bridge, as I believe are many in CEC.

New P+R sites are an intrusion into Green Belt, and a likely erosion of public transport, therefore to be treated with caution.

3 Business and Industry Designations: these are mostly deletions of earlier designations. We have no comment to make.

4 Supermarket Provision: we agree that there are no apparent gaps in provision (but see below). We would argue that there are already too many, in some areas, thus detracting from town centres.

We note also that "planning permission has recently been granted on out-of-centre sites", and this is a cause of concern because in some cases, officials have recommended refusal, but the Committee has decided otherwise. Developers are very clever at manipulating local public opinion, eg with 'loaded' questionnaires: "do you want 300 jobs created locally?" (when, in fact, these are mainly re-locations, not 'new' jobs); "do you want more choice in your shopping?" (when, in fact, other local stores will be driven out of business, meaning less choice). They do not ask questions like: "do you want your local shops to close"?, or, "do you want lots more traffic on your local roads?", "do you want cars rat-running down your side streets?", etc.

Perhaps the answer might be for officials to meet with the councillors on the committee before a decision is made, simply pointing out the bias (and leading questions) in questionnaires that might have swayed public opinion.

One area where provision DOES seem lacking, however, is Balerno/Currie/Juniper Green. None of the 'big four' has a supermarket there, with the result that the main and only artery, the Lanark Rd (West), is badly congested with cars heading to and from supermarkets closer into town, just on shopping expeditions. New supermarkets in Currie and Balerno might save many car journeys, to the benefit of everyone.

5 Landscape Designations: we note the merging of AOLQs and AGLVs into cSLAs.

We are opposed to any housing on the Drum Estate, for reasons given earlier, and the cSLA designation reinforces our views. Housing here is neither desirable nor necessary.

6 Implementing the OSS: we have noted earlier the desirability of implementing this across the whole city, so that all can benefit, in conjunction with development of brownfield sites.

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CTC is the national cyclists' association, with over 1000 members in Edinburgh and the Lothians